Message

From: Fitzpatrick, Kacey [Fitzpatrick.Kacey@epa.gov]
Sent: 2/9/2021 7:32:52 PM
To: Hubbard, Carolyn [Hubbard.Carolyn@epa.gov]

Assessments develop a single toxicity value (e.g., for noncancer, a reference dose/concentration) for a given duration of exposure. In the PFBS assessment, OCSPP determined that a lower uncertainty factor (UF) could be used for toxicity values. As a result, the current assessment offers a "lower" and "higher" toxicity value as options.

- ORD was informed that Administrator Wheeler determined that uncertainty factors were policy, not scientific judgments, used here to justify two toxicity values. This is contrary to long-standing risk assessment practices based on National Academy of Sciences (NAS) guidance.
- This is a significant change in the way toxicity values are developed and reported in the Agency. A decision to present toxicity values this way is not scientifically sound and not implementable by programs (e.g. under CERCLA/RCRA).
    - EPA's Science and Technology Policy Council and the Risk Assessment Forum had already initiated a review of Agency risk assessment practices where uncertainty factors will be further discussed.
- Such an approach could lead to number-shopping and promote inconsistency and confusion in the application of toxicity values derived by the Agency